



Minnesota Pollution Control Agency

520 Lafayette Road North | St. Paul, Minnesota 55155-4194 | 651-296-6300

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May 1, 2014

Ms. Wendy Menken
South East Como Improvement Association
1170 15th Avenue SE
Minneapolis, MN 55414

RE: April 1, 2014 SECIA Board Letter Regarding the General Mills site, 2010 East Hennepin Avenue, Minneapolis

Dear Ms. Menken:

The Minnesota Pollution Control Agency (MPCA) has received correspondence from South East Como Improvement Association (SECIA) regarding the General Mills Superfund Site. The letter, drafted by Theodore C. Johnson, PE, was approved by the SECIA Board on April 1, 2014.

The letter requests immediate implementation of a cleanup plan presented in a 1983 Site Characterization and Remedial Action Plan. The SECIA letter requests immediate excavation of an area 50 feet in diameter centered on the former absorption pit. Chemical disposal using the absorption pit occurred on the former General Mills property between 1947-1962. During a meeting on April 23, 2014, with SECIA, MPCA, Minnesota Department of Health, Barr Engineering and General Mills, Theodore C. Johnson modified the requested excavation area to be 30 feet in diameter. This change was made with the intention of avoiding work needing to be conducted on the adjacent Burlington Northern Santa Fe Railway property. The SECIA letter also requests modification of the timeline MPCA has presented for future actions at the General Mills Superfund Site to include the requested excavation.

The MPCA agrees with SECIA that additional work is needed in the former absorption pit area and that this work needs to move forward quickly. However, in order to most effectively address this work, it would be helpful to use cleanup and testing technologies that have been developed since the 1983 plan was drafted. The MPCA does not believe that conducting an excavation is the most appropriate first step.

The amount and exact location of contamination near the former absorption pit is likely to have changed since 1983. Because of these changes, additional data are needed before proceeding with development of a cleanup plan. It is possible that today much of the remaining contamination is present below the water table. Working below the water table complicates excavation work; this is particularly true when soil and groundwater are contaminated. If the investigation identifies that the remaining contamination is mostly below the water table, excavation may not be a viable cleanup approach.

On or before June 11, 2014, General Mills will submit to the MPCA a work plan that will include the following elements:

Ms. Wendy Menken

Page 2

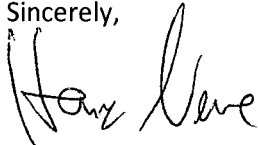
May 1, 2014

- 1) A plan for sampling soil gas and groundwater to define the limits of the contamination. Some portion of this work has been completed as part of the building testing and mitigation work that has taken place since November 2014.
- 2) A plan for drilling soil borings and testing in the area of the former absorption pit to define the limits of the contamination that exist today.
- 3) A plan for conducting small-scale tests to evaluate cleanup technologies that may be considered for future full-scale implementation. This may be needed to test effectiveness of a potential cleanup plan. The information may be helpful in the process of developing a final cleanup plan. The process of selecting a cleanup plan will include public input.

Additional work near the former adsorption pit is part of the work plan that will be submitted to the MPCA in June 2014. However, given the need for rapid action, some of this work will begin in early May. Some of this investigative work in May will utilize a newer technology called Membrane Interface Probe (MIP) developed by a company called Geoprobe Systems.

To conduct this work in May, General Mills is working on securing property access, and Barr Engineering is developing a work plan for MPCA review and approval. A drilling contractor has been scheduled for May 6, 2014.

Sincerely,



Hans Neve

Supervisor

Site Remediation and Redevelopment Section

Remediation Division

HN:jmp

cc: Cam Gordon, Minneapolis Councilmember, Ward 2
Kevin Reich, Minneapolis Councilmember, Ward 1
Jacob Frey, Minneapolis Councilmember, Ward 3
Cindy Weckwerth, City of Minneapolis
Daniel Huff, City of Minneapolis
Lee Anderson, General Mills, Inc.
Larry Deeney, General Mills, Inc.
Mary Sands, Barr Engineering
Rita Messing, MDH
James Kelly, MDH
Leah Evison, EPA